

Exhibit 2

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF FLORIDA
3 MIAMI DIVISION
4
5 FARHAD AZIMA,
6 Petitioner,
7 vs. Case No.:
8 INSIGHT ANALYSIS AND RESEARCH LLC 1:22-MC-20707
9 AND SDC-GADOT LLC,
10 Respondents.
11
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14 Videotaped 30(b)(6) Deposition of
15 SDC-GADOT LLC
16 by and through its Corporate Representative
17 AMIT FORLIT
18 Wednesday, July 20, 2022
19 11:09 a.m. Israel Daylight Time
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22
23
24
25 Reported by: BRENDA MATZOV, CSR NO. 9243

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30(B)(6) SDC-GADOT LLC

1 APPEARANCES:
2 FOR PETITIONER:
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11 FOR RESPONDENTS:
12 MILLER & CHEVALIER CHARTERED
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1 Videoconference 30(b)(6) deposition
2 of SDC-GADOT LLC, by and through its Corporate
3 Representative, AMIT FORLIT, taken in the
4 above-entitled cause pending in the United
5 States District Court, for the Southern
6 District of Florida, Miami Division, before
7 BRENDA MATZOV, CSR NO. 9243, at the David
8 Intercontinental Hotel, Tel Aviv, Israel,
9 and simultaneously in the Zoom participants'
10 remote locations, on Wednesday, the 20th
11 day of July, 2022, at 11:09 a.m. Israel
12 Daylight Time.
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1 APPEARANCES (Continued):
2 ALSO PRESENT (in Israel):
3 MITCHELL COOPERSMITH, Videographer
4 HAYA SHAVIT-KEDAR, Hebrew Interpreter
5 RUCHIE AVITAL, Hebrew Interpreter
6
7 ALSO PRESENT (remotely via Zoom):
8 LESLEY SEMONES, Miller & Chevalier
9 FREDERICK WILMOT-SMITH, Burlingtons Legal
10 LUKE HACKETT, Burlingtons Legal
11 FARHAD AZIMA
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1 from the Israeli Ministry about your travel?

2 A. Yes. Every citizen can do that.

3 Q. And do you have a copy of that
4 with you today?

5 A. I have it in the mail. I can
6 have it printed if you want.

7 Q. Okay. We'd appreciate that.

8 A. My attorney will provide you
9 that in reference to the specific dates.

10 Q. (Not translated.) Now, going
11 back to the people you might have spoken
12 with to prepare for your testimony, did
13 you -- did you speak with anyone from
14 Karv Communications, such as Andrew
15 Frank, before you --

16 THE INTERPRETER: From Karv?

17 BY MR. BEHRE:

18 Q. (Not translated.) -- testified
19 here today?

20 THE INTERPRETER: Karv -- Karv
21 Communications?

22 MR. BEHRE: Karv, K-a-r-v.

23 THE INTERPRETER: Okay.

24 (Pending question translated.)

25 THE WITNESS: Just like my

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1 previous answer, I have never met him.

2 I don't know him. I have never communicated
3 with him.

4 BY MR. BEHRE:

5 Q. And how about David Hughes?

6 A. I have met David Hughes when he
7 was working at Dechert. And I believe that
8 the last time I met him was in that meeting
9 in Cyprus, which is described in Stuart's
10 affidavit. I have never communicated with
11 him directly, neither before nor after, and
12 not indirectly either.

13 Q. Okay. And how about Majdi Halabi?

14 A. The last time I spoke to Majdi
15 Halabi was after he submitted his affidavit.

16 After I have learned about his
17 affidavit from the Reuters reporter, I
18 called him. And he refuted, he denied
19 that he had provided such an affidavit.
20 And when I saw -- when I saw it, I -- I
21 cut my connections with him. And since
22 then, I have not spoken to him.

23 Q. When's the last time you
24 communicated with him by text, e-mail,
25 or messaging service?

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1 A. It was a telephone conversation.

2 And I believe it was close to the date
3 that he had submitted his affidavit. And
4 since then, I had no communication with
5 him whatsoever.

6 Q. (Partially translated.) Okay.
7 How about the U.K. lawyer, Lucy Ward, did
8 you speak with her before you testified
9 here today?

10 THE COURT REPORTER: "Lucy."

11 THE INTERPRETER: What's her
12 name? Lucy Ward. Lucy Ward.

13 (Remainder of pending question
14 translated.)

15 THE WITNESS: I don't know this
16 lady. And I've never spoken to her.

17 BY MR. BEHRE:

18 Q. Have you ever communicated with
19 her in any other way?

20 A. No.

21 Q. How about Nicholas Del Rosso,
22 did you speak with him before you
23 testified here today?

24 A. Same answer.

25 In all my 55 years of existence,

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1 never met, never heard, never spoken, don't
2 know.

3 Q. But you've certainly heard of him;
4 right?

5 A. Yes.

6 Now, seriously, in the beginning
7 of the investigation, I learned that Nick
8 Del Rosso was recruited and he's working
9 on the case in parallel to us but on
10 different -- other issues.

11 I remember that Stuart Page
12 was deeply offended that Nick Del Rosso
13 is being employed. And he was told that
14 Nick's employment had been suspended.

15 And the next time we encountered
16 the name of Nick Del Rosso, we were told
17 that he was making the connection between
18 a company that was studying the materials
19 leaked from Farhad Azima and the customer,
20 the client.

21 THE COURT REPORTER: "And" or
22 "in"?

23 THE INTERPRETER: "And the client."

24 BY MR. BEHRE:

25 Q. The connection between a company

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1 technology. And if somebody has hacking
2 ability, they just write that they can
3 hack.
4 Q. And then on page 9, the war
5 terms continue:
6 "In order to eliminate FA's
7 activity" against the -- "regarding
8 the client," it says. (As read.)
9 Do you see that?
10 A. Where is it approximately on
11 the page?
12 Q. (Not translated.) Page 9 --
13 THE INTERPRETER: Page --
14 BY MR. BEHRE:
15 Q. (Not translated.) -- under:
16 "5. Involvement of" the "U.S.
17 Relevant Authorities." (As read.)
18 A. This looks like a strategic document
19 that somebody prepared. And this -- this
20 is not a subject we deal with.
21 Q. Well, not only does this document
22 entitled "Project Beech" --
23 MR. BARET: Excuse me. That's
24 not what he said.
25 He said: "It's not our document."

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1 THE INTERPRETER: Aah, you're right.
2 Thank you.
3 MR. BARET: Okay.
4 THE INTERPRETER: "And it's not our
5 document."
6 Thank you.
7 BY MR. BEHRE:
8 Q. This document is labeled:
9 "Project Beech."
10 You were involved in Project Beech.
11 And this establishes, just like the last
12 document, contrary to your testimony, that
13 Farhad Azima was not only being investigated,
14 he was being attacked, he was being targeted,
15 and he was in jeopardy because of that.
16 Isn't that right?
17 A. As I said, my reports on Project
18 Beech were sent to Stuart Page in an open
19 format. I don't know who else Stuart used
20 the name Project Beech with. He made up
21 that name.
22 I know that we did not investigate
23 Farhad Azima. We did not target him as
24 a target. But it's quite clear that
25 somebody did, because somebody hacked

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1 and leaked his computers.
2 And based on the procedures
3 that are used in the U.S., I think you
4 know who it is.
5 Q. And who would that be?
6 A. Nick Del Rosso. According --
7 based on the proceedings against Nick
8 Del Rosso, I conclude that.
9 Q. And what's your basis for
10 saying Nick Del Rosso is the party who
11 wrote this report?
12 Is that what you're saying?
13 A. I didn't say Nick Del Rosso
14 wrote this report. I said that we did
15 not write this report.
16 And based on all the proceedings
17 that are being carried out, the person
18 who is responsible for the hack and the
19 leaks of the hacking is Nick Del Rosso.
20 Q. Now, you indicated that Nick
21 Del Rosso and Stuart Page did not get
22 along; right?
23 A. I heard from Stuart that he
24 didn't like, to put it mildly, Nick Del
25 Rosso. But I -- I didn't even know if

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1 they knew each other.
2 Q. And the reason Stuart Page
3 didn't like Nick Del Rosso is because
4 Stuart Page thought Nick Del Rosso was
5 taking business away from Stuart Page;
6 correct?
7 A. I don't know.
8 Q. (Not translated.) Nick Del
9 Rosso didn't report to Stuart Page,
10 did he, because they hated each other?
11 A. To the best of my knowledge,
12 no.
13 Q. And so, therefore, Nick Del
14 Rosso is not a likely suspect for the
15 content of this report, since he would
16 have had to give it to his archenemy,
17 Stuart Page, to incorporate it in the
18 report; right?
19 A. (Translated.) I'm not attributing
20 this report to anyone's authorship. I'm
21 just saying that we didn't write it and
22 we did not investigate --
23 (In English.) Farhad Azima.
24 THE INTERPRETER: Sorry. It's
25 late.

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